

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

AMNESTY INTERNATIONAL USA, CENTER  
FOR CONSTITUTIONAL RIGHTS, INC. and  
WASHINGTON SQUARE LEGAL SERVICES,  
INC.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,  
DEPARTMENT OF DEFENSE, DEPARTMENT  
OF HOMELAND SECURITY, DEPARTMENT  
OF JUSTICE, DEPARTMENT OF STATE, AND  
THEIR COMPONENTS

Defendants.

**ECF CASE**

07 CV 5435 (LAP)

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL TO PLAINTIFFS AMNESTY  
INTERNATIONAL USA AND WASHINGTON SQUARE LEGAL SERVICES, INC.**

Pursuant to Local Rule 1.4, undersigned counsel respectfully requests that this Court grant leave to Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale") to withdraw as counsel to plaintiff Amnesty International USA ("Amnesty International") and plaintiff and co-counsel Washington Square Legal Services, Inc. ("WSLS") (collectively, "Plaintiffs") in the above captioned matter. In support of this motion, counsel states as follows:

1. On June 7, 2007, Plaintiffs brought suit before this Court pursuant to the Freedom of Information Act in order to obtain the processing and release of records from Defendants Central Intelligence Agency, Department of Homeland Security, Department of Defense, Department of State, and Department of Justice. Plaintiffs have been represented in this action by WilmerHale and WSLS.

2. The parties have filed motions and cross-motions for summary judgment with respect to the Department of Homeland Security. This Court heard oral argument on those motions on May 22, 2008.

3. On May 23, 2008, WilmerHale discovered a conflict between Plaintiffs and other WilmerHale clients as a result of which WilmerHale's exercise of independent judgment on behalf of Plaintiffs will be or is likely to be adversely affected and which is likely to involve WilmerHale representing different interests. See Disciplinary Rule 5-105(B). WilmerHale's continued representation of Plaintiffs in this action is likely to prejudice Plaintiffs as well as WilmerHale's other clients.

4. Pursuant to a Stipulation entered on April 21, 2008, the parties are currently briefing their motions and cross-motions for summary judgment with respect to the Central Intelligence Agency ("CIA"). Plaintiffs' cross motion for partial summary judgment and opposition to the CIA's motion for summary judgment are currently due on May 28, 2008. As Plaintiffs and co-plaintiff Center for Constitutional Rights ("CCR") indicated to the Court yesterday, they are requesting an extension of this deadline. Plaintiffs and CCR are currently negotiating a revised briefing schedule with counsel for the CIA and will notify the Court of this schedule in a separate letter.

5. Briefing of motions for summary judgment with respect to the Department of Defense, Department of State, and Department of Justice has not yet been scheduled.

6. Amnesty International and WSLs are in the process of identifying replacement co-counsel as expeditiously as possible.

7. Amnesty International and WSLs consent to this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kyle M. DeYoung', written over a horizontal line.

Kyle M. DeYoung  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, DC 20006  
Tel: (202) 663-6785  
Fax: (202) 663-6363  
E-Mail [Kyle.DeYoung@wilmerhale.com](mailto:Kyle.DeYoung@wilmerhale.com)

*Attorneys for Amnesty International USA  
and Washington Square Legal Services, Inc.*

Dated: May 28, 2008